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4 Attorney for Mr. Henley
5 EUGENE HENLEY, JR.

6 **UNITED STATES DISTRICT COURT**
7 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

8 UNITED STATES OF AMERICA,
9 *Plaintiff,*

10 v.

11
12 EUGENE HENLEY, JR., *et al,*
13 *Defendant.*

No. 2:25-cr-00211-FLA-1

EXHIBIT IN SUPPORT OF *EX*
***PARTE* APPLICATION FOR**
TEMPORARY RELEASE TO
ATTEND RELIGIOUS BURIAL
CEREMONY

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16
17 Mr. Eugene Henley, Jr., by and through his counsel of record, Craig A.
18 Harbaugh and Peter Johnson, hereby submits Exhibit A (Letters) in support of Ex
19 Parte Application for Temporary Release to Attend Religious Burial Ceremony.

20 Respectfully submitted,

21
22 Dated: November 13, 2025 /s/ *Craig A. Harbaugh*
23 CRAIG A. HARBAUGH
24 Attorney for Eugene Henley, Jr.

Exhibit A

Letter of support from friends, family, and community members.

Character Letter Requesting Release for Eugene Henley

Advocating Compassionate Leave to Attend Son's Funeral

To Whom It May Concern,

I am writing this letter on behalf of Eugene Henley, respectfully requesting his temporary release to attend the funeral of his beloved son. I understand that Eugene is currently addressing allegations levied against him, but it is important to recognize the profound significance of this moment and the impact it will have on his family and emotional well-being.

Since his last release, Eugene has demonstrated exemplary conduct and has become a pillar of our community. He has dedicated himself to assisting at-risk youth and reentry clients, guiding them as they transition back into society. Eugene's commitment to helping others has been evident in his volunteer work, mentorship, and advocacy for those facing challenges similar to those he has overcome.

Through his tireless efforts, Eugene has played a vital role in fostering hope and positive change among individuals who might otherwise feel marginalized or unsupported. His compassionate approach and willingness to share his experiences have helped many young people and returning citizens find their footing and strive for success.

Allowing Eugene to attend his son's funeral would be a compassionate gesture that honors the family bond and the progress he has made in his personal journey. It is my sincere belief that granting this request will not only provide solace to Eugene and his family but also reinforce the values of empathy and understanding within our justice system.

Thank you for considering this request. I am confident that Eugene will continue to be a positive influence in our community, and I respectfully urge you to allow him this opportunity to grieve and support his loved ones during this difficult time.

Sincerely,

Steven Epstein

10850 Wilshire Blvd Ste 770

Los Angeles, Ca 90024-4305

(310) 474-4533

The Henley Family
Los Angeles, CA

Date: November 4, 2025

To the Honorable Fernando L. Aenlle-Rocha
United States District Court

Subject: Compassionate Request for Temporary Release of Mr. Eugene Henley to Attend His
Son's Funeral

Dear Honorable Judge Rocha,

We, the family of Mr. Eugene Henley, write this letter with deep respect and a heartfelt plea. Our family recently suffered an unimaginable loss with the murder of his beloved son, Jabari Henley. We humbly request your compassion and consideration in allowing Mr. Henley to attend his son's funeral service November 21, 2025.

Jabari was Mr. Henley's third child and second son. Their bond was profoundly rooted in love, respect, and shared purpose. Eugene took great pride in teaching Jabari the values of manhood, family, and responsibility. He showed his son what it means to lead with strength and integrity, to protect and provide, and to stand firm as a man devoted to his family and community. Jabari's passing has left a deep void in our hearts, especially for his young son, who has now lost his father far too soon.

Having Mr. Henley present at the funeral would mean more than words can express. He is one of the strong heartbeats of our family—a steady presence whose guidance and faith have shaped generations. We understand the seriousness of his current circumstances and hold profound respect for the legal process. However, we also believe that moments such as this call for compassion, understanding, grace and humanity.

This is not only a time for our family to lay Jabari to rest, but also an opportunity for Mr. Henley to find some measure of peace and closure as a grieving father. His presence would help bring healing to his wife, children, and all of us who love him. His absence would deepen the heartbreak we are already facing.

Thank you for taking the time to read our letter and consider our request. We pray this appeal finds the compassion and understanding that our family so deeply needs during this heartbreaking time.

With sincere gratitude and respect,

On Behalf of the Henley Family

Name & Relationship to Eugene Henley

Stacey Henley wife

Name & Relationship to Eugene Henley

Shamamika Boykin Neice

Name & Relationship to Eugene Henley

Curry Henley Sister

Name & Relationship to Eugene Henley

An D Sister

Name & Relationship to Eugene Henley

Jim D Brother

Name & Relationship to Eugene Henley

KYREE TOADVINE NEPHEW

Name & Relationship to Eugene Henley

Daneth W. Henley (niece)

Name & Relationship to Eugene Henley

Brittany Lefridge (niece)

Name & Relationship to Eugene Henley

Cherysh Henley (DAUGHTER)

Name & Relationship to Eugene Henley

Kawla Closure (God-sister)

Name & Relationship to Eugene Henley

La'Zan Dale (Grand)

Name & Relationship to Eugene Henley

Mattie G. Evans (Mother)

Name & Relationship to Eugene Henley

Takisha Digree (sister-in-law)

Name & Relationship to Eugene Henley

Kinda L. Shelton Auntie

Name & Relationship to Eugene Henley

Randa Hardy / Cousin

Name & Relationship to Eugene Henley

Amira Toadvine / Niece

Name & Relationship to Eugene Henley

Zoie Strawbridge-Dupree Niece

Name & Relationship to Eugene Henley

MARIO HARDY - COUSIN

Name & Relationship to Eugene Henley

Jesse Smith - Cousin

Name & Relationship to Eugene Henley

Monica Saunders - God Sister

Name & Relationship to Eugene Henley

Tracy Hyphite God Sister

Name & Relationship to Eugene Henley

Eddie J. Shelt - Uncle

Name & Relationship to Eugene Henley

William Shelton III
Cousin

Name & Relationship to Eugene Henley

William Shelton JR
COUSIN

Name & Relationship to Eugene Henley

Name & Relationship to Eugene Henley

Name & Relationship to Eugene Henley

Name & Relationship to Eugene Henley

Name & Relationship to Eugene Henley

Name & Relationship to Eugene Henley

Samyah Ralls

2851 W. 120th St.

Hawthorne, CA 90250

samyahralls@gmail.com

323-602-9135

November 3, 2025

The Honorable Judge Rocha,

Re: Compassionate Release Request for Eugene Henley

Dear Judge Rocha,

I am writing to respectfully request a compassionate release for Eugene Henley. Last Friday, an unforeseen tragedy occurred: Mr. Henley's son passed away. This heartbreaking loss has deeply affected the family, and I am asking that grace and understanding be extended to allow Mr. Henley to attend the services for his third-born child.

I respectfully ask that you consider this request with compassion and humanity. Allowing him to be present for his family during this profoundly difficult time would honor both his role as a father and the principles of justice tempered with mercy.

Thank you for your time and consideration of this urgent request.

Sincerely,

Samyah Ralls

November 5, 2025

Honorable Judge Rocha

Re: Compassionate Release Request for Mr. Eugene Henley

Dear Judge Rocha,

My name is **La'loni Dale**, and I am writing to you with deep respect and compassion on behalf of **Mr. Eugene Henley**. I am requesting your consideration for a **compassionate release** to allow Mr. Henley to attend the funeral services of his son, who recently passed away in a tragic and unforeseen event.

This loss has devastated Mr. Henley and his family. As a father, he is experiencing an unimaginable pain that no parent should have to endure. Allowing him the opportunity to say a final goodbye to his son would offer him and his family an essential moment of closure and peace during this time of profound grief.

Mr. Henley has long been a devoted father, community mentor, and a man who values family deeply. Granting him this brief period of release would not only demonstrate compassion but would also reflect the humanity and grace of the justice system he has always respected.

I sincerely ask that you please take this request into consideration and allow Mr. Henley to attend his son's funeral and be with his loved ones as they mourn. Your understanding and empathy in this matter would mean more than words can express to the grieving Henley family.

Thank you, Your Honor, for your time, compassion, and consideration of this request.

With deepest respect,
La'loni Dale

The Honorable Judge Roche

Re: Compassionate Release Request for Eugene Henley

Dear Judge Roche,

My name is Scott Burden, and I am writing on behalf of my friend, Eugene Henley. I have personally experienced the profound pain of losing a child, and I understand the depth of grief that accompanies such a tragedy. Mr. Henley is now enduring that same unimaginable loss—the passing of his son.

I respectfully ask that compassion be extended to Mr. Henley by granting him a temporary release so he may join his family in mourning and have the opportunity to say a final goodbye to his child. Allowing him this moment would not only bring comfort to a grieving father but would also demonstrate the court's grace and humanity in the face of such loss.

Thank you for your time and thoughtful consideration of this request.

Sincerely,

Scott Burden

Mario Hardy
4549 w. 170th St.
Lawndale Ca. 90260
Hardyshardest@gmail.com
11/4/2025

Honorable Judge Fernando L. Aenlle-Rocha
First Street U.S. Courthouse, Los Angeles
Courtroom 6B, 6th Floor

Re: Request for Compassionate
Release of Eugene Henley

Dear Judge Fernando L. Aenlle-Rocha,

I am writing to you today with a heavy heart and deep respect to request your compassion and understanding in allowing my cousin, Eugene Henley a temporary release from custody so that he may attend the funeral of his beloved son, Jabari Henley who tragically passed away on October 31, 2025. This loss has shattered our entire family, but no one is feeling the pain more deeply than his father Eugene Henley. He is a father who will never again have the chance to hold his child, to hear his voice, or to say goodbye properly. I plead to you to please give Eugene Henley the opportunity to attend his son's funeral.

I understand and deeply respect the responsibility of the Court to uphold justice and maintain safety. However, humbly ask that mercy and humanity be considered in this extraordinary circumstance. Allowing Eugene Henley this brief moment to say goodbye to his child would mean more than words can express-not just to him, but to our entire family who wish to support him in this time of unimaginable loss.

Our family is willing to comply with any conditions the Court may impose to ensure that this request is carried out safely and respectfully. We will work closely with law enforcement or correctional officers to make all necessary arrangements.

Thank you for your time,
Understanding and consideration of this plea.

With deepest respect and sincerity,

Mario Hardy

Eugene Henley's cousin

Honorable Fernando L. Aenlle Rocha

United States District Court

First Street U.S. Courthouse

350 West 1st Street

Los Angeles California 90012

Your honor ,

My name is Sana Hicks and I am hoping this letter reaches you. I am reaching out due to my cousin Mr Dante Henley who is currently in custody. On November 1, our family lost Dante's son, Jabari Henley, to gun violence. Jabari's passing has deeply affected every one of us. This tragedy has brought pain and heartbreak to us. As a family, we are coming together to hold one another and to honor Jabari's memory.

The weight of grieving a child is something no parent should have to bear alone. Our family is respectfully requesting that Dante be granted the opportunity to attend Jabari's funeral services once the arrangements are finalized. Our only hope is that he is able to be present to say goodbye. We offer this request with complete respect.

Sincerely ,

Sana Hicks

Hickssana8@gmail.com

323-864-0530

Good afternoon, Judge Rocha,

I'm writing with a heavy heart to respectfully ask for a compassionate release for Eugene Henley, so that he can attend the funeral services for his son, Jabari.

Losing a child is a pain no parent should ever have to face. This loss has left a deep void in the entire family & community, but especially in his heart.

Jabari held a special place in all our life but especially with his dad. Their bond was filled with love, lessons, and memories that can never be replaced.

Being able to attend his son's service, to say goodbye, and to stand with his family in grief and love would mean more to not only him but his wife and other kids that are going through an unthinkable situation than words can't fully express.

I am asking from a place of love and compassion. This loss has shaken all of us, as a family and community, we need to be together to get through it.

Allowing him to attend and honor his son's life would bring comfort, healing, and a sense of peace in the middle of this heartbreak. Thank you sincerely for your time, understanding, and compassion in reviewing this request.

Sincerely,
Brittany Hawkins

Sharneal Shorts
6625 2nd Ave
Los Angeles, CA 90043
424-379-7042
Sharneal2@icloud.com

Date: November 3, 2025

To:
The Honorable Judge Rocha

Subject: Compassionate Release Request on Behalf of Mr. Eugene Henley (Inmate #67683-511)

Dear Judge Rocha,

I am writing with the utmost respect and compassion on behalf of **Mr. Eugene Henley**, who is currently incarcerated at **MDC Los Angeles**. I respectfully request that the Court consider granting compassionate release or temporary furlough due to the recent and devastating loss of his son, **Jabari Henley**, who was tragically murdered on **October 31, 2025**.

Jabari was not only Eugene's beloved son but also a close childhood friend of mine. His sudden passing has deeply affected everyone who knew him and left an irreplaceable void in his family and our community. Jabari leaves behind a young son of his own, who will now grow up without his father's love and guidance.

Mr. Henley is enduring the unbearable pain of losing his child while being unable to be present with his family to grieve or provide comfort. Throughout his incarceration, he has taken meaningful steps toward personal growth, maintained good conduct, and expressed sincere remorse for his past actions. He has shown dedication to rehabilitation and a genuine desire to become a better man and father.

Granting this compassionate release would allow Mr. Henley the opportunity to properly mourn his son, support his grandson, and begin to heal alongside his family. It would be a profound act of humanity and mercy during an extraordinarily painful time.

Thank you for your time, understanding, and consideration of this request. I have great respect for the Court and trust in your compassion and fairness.

With sincere gratitude and respect,

Sharneal Shorts
Friend of the Henley Family
6625 2nd Ave
Los Angeles, CA 90043
424-379-7042
Sharneal2@icloud.com

11/4/2025

Dear Honorable Judge Rocha,

I am writing to you on behalf of Eugene Henley, who is a beloved husband, an amazing uncle, brother, cousin, and most importantly, a devoted father. During this incredibly challenging time, his family, especially his children and his wife, deeply need his presence and support as they navigate the loss of their son and brother.

His family is enduring an unimaginable loss, the passing of their son. His wife, in particular, is facing a grief no mother should ever have to experience. The thought of her having to bury their child alone is heartbreaking beyond words. During this devastating time, she needs the love and strength of her husband by her side to help her endure what no parent should ever face.

We respectfully ask that you consider the depth of this family's pain and the importance of allowing Eugene to be present with his wife and children as they grieve together and begin the long process of healing. A compassionate release would be greatly appreciated for him to attend the services of his son Jabari Henley.

Thank you for your understanding and consideration.

Sincerely,

Tiffini Johnson

The Honorable Judge Aenlle-Rocha,

I am Firefighter/Paramedic Kyree Toadvine, humbly writing in request to allow my uncle, Eugene Henley, to attend the funeral services for his son, Jabari Henley, whose life was cut short on 10/31/2025. My uncle has been as much of a grounding presence and staple in my life as Jabari has. Jabari and I were the same age, born a few months apart, and we spent a great deal of our early lives together, sharing some of the same life shaping core memories, many of which involved my uncle's presence. Optimally, I'd request for my uncle, Eugene, to be allowed to spend more time with the family, as this untimely death has come as a great shock to our family. However, I humbly ask for, at the very least, for my uncle to be allowed to attend the funeral service. If you see fit for more time to be allowed I know that this entire family and extended support system would be extremely grateful for what you allow.

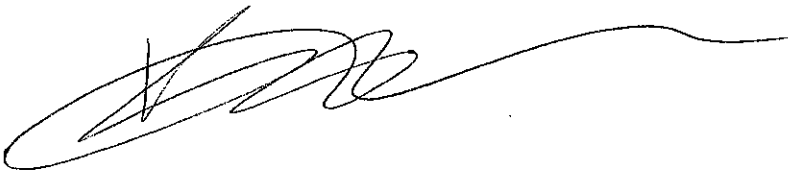
Growing up we have always had a strong and large support system and I am proud to grow into my role as a 10 year Firefighter/Paramedic for the City of Los Angeles because of it. I also still live in this city, I have not left and I do not plan to ever leave; I currently reside only 3.8 miles away from Eugene's primary residence. These things allow me to now become a strong part of the support system that helped make me the man I am today, and I want to offer to do whatever I can to be a support system for my uncle if you see that it is appropriate for him to be released for any amount of time. If there is anything I can offer of myself to allow my uncle any amount of time to be with the family, I ask humbly that you allow me to give this of myself, as a service to my family and of the city that I serve as given the circumstances at hand, I strongly believe he does not pose a threat to the public.

Contact Information

Kyree Toadvine
(323)828-8990
Ktest91@gmail.com

Thank you for your time and consideration.

Kyree Toadvine

A handwritten signature in black ink, appearing to be 'Kyree Toadvine', with a long, sweeping horizontal line extending to the right.

Dear Judge Rocha,

I am writing to respectfully request a compassionate release for Eugene Henley to attend his son's funeral services. This is an incredibly tragic event, and as a parent, no one should have to miss such an important moment with their family.

I kindly ask for your compassion for him and his grieving family, and that he be allowed to support his loved ones during this difficult time.

Thank you for your consideration.

Sincerely,
Nicole Davis

A handwritten signature in black ink, appearing to read "N Davis", followed by a horizontal line.